

# Exhibit B

**EX. B to Henenway**  
*(Alphabetically by Last Name of 9/11 Decedent)*

	DECEDENT First Name	DECEDENT Middle Name	DECEDENT Last Name	Suffix Name	Economic Damage Amount	Non-Economic Damage Amount	TOTAL Damage Amount
1.	Ronald	J.	Hemenway			\$2,000,000	\$2,000,000
2.	Lucille	T.	King		\$1,019,801	\$2,000,000	\$3,019,801
3.	Nancy		Liz			\$2,000,000	\$2,000,000
4.	Francisco	M.	Mancini		\$6,251,514	\$2,000,000	\$8,251,514
5.	Joseph	J.	Ogren			\$2,000,000	\$2,000,000
6.	Samuel		Oitice			\$2,000,000	\$2,000,000
7.	James		Patrick		\$5,661,480	\$2,000,000	\$7,661,480
8.	Carol		Rabalais		\$1,509,626	\$2,000,000	\$3,509,626
9.	Laura		Ragonese- Snik			\$2,000,000	\$2,000,000
10.	Vernon	A.	Richard			\$2,000,000	\$2,000,000
11.	Marsha	A.	Rodriguez			\$2,000,000	\$2,000,000

**TOTALS**

\$14,442,421

\$22,000,000

**\$36,442,421**

# **Exhibit B-1**

**John E. Beauzile**

28 Penny Lane

Binghamton, NY 13905

Email: [jeb2235@columbia.edu](mailto:jeb2235@columbia.edu)

**Jerry S. Goldman**

Anderson Kill

1760 Market Street, Suite 600

Philadelphia, PA 19103

Re: Update of Analysis of Economic Loss in the Matter of  
The Estate of **Mrs. Carol M. Rabalais**

January 4, 2020

Dear Mr. Goldman,

You have asked me to update the present value numbers in the analysis of the likely economic loss award from the September 11<sup>th</sup> Victim Compensation Fund prepared by **The Fund** dated **March 1, 2004**. I have used their assumptions for wages, benefits, taxes, personal consumption, replacement services, and discount rate to estimate those values and bring them to the present. The valuation date chosen is **January 1, 2020**.

In preparing this update, the only document reviewed is **The Fund's** report. This update assumes the reader is familiar with the methodology used and assumptions made by **The Fund** and, therefore, they will not be restated here.

The update of **The Fund's** analysis is summarized in four (4) sets of Exhibits.

- *Exhibit 1* provides the summary of Lost Earnings, Retirement Benefits, and Lost of Replacement Services;
- The set of *Exhibits 2s* shows the details behind the loss of earnings numbers;
- The *Exhibit 3* set provides supporting documentation for Retirement Benefits;
- The loss of Replacement Services amounts are in *Exhibits 4s*.

I believe that I have already provided you with a copy of my curriculum vitae. If you need a copy, please let me know.

Sincerely,



John E. Beauzile

VALUATION DATE	01-JAN-20
DISCOUNT RATE	3.9%

**EXHIBIT 1. SUMMARY OF ECONOMIC DAMAGES**  
**MRS. CAROL M. RABALAIS**

	<b>PRESENT VALUE</b>
Present Value of Lost Earnings	\$1,297,191
Present Value of Retirement Benefits	212,435
Present Value of Lost Replacement Services	0
<b>Total</b>	<b>\$1,509,626</b>

Base Salary	Unempl.	Tax Rate	Benefits	Pers. Consump.
48,125	3.0%	15.410%	2,446	8.18-20.52%

**EXHIBIT 2A. PRESENT VALUE OF LOST EARNINGS**  
**MRS. CAROL M. RABALAIS**  
SPECIAL MASTER WORKLIFE

YEAR	AGE	TIME FRAME	AGE- SPECIFIC GROWTH FACTOR	EARNINGS	BENEFITS	UNEMPL. ADJ.	TAXES	CONSUMPTION	NET EARNINGS	PV OF NET EARNINGS
2001	38	0.31	1.00000	\$14,757	\$750	\$0	(\$2,274)	(\$1,021)	\$12,212	\$12,212
2002	39	1.31	1.05580	50,810	2,582	(1,355)	(7,595)	(3,409)	41,034	41,034
2003	40	2.31	1.05379	53,544	2,721	(1,428)	(8,004)	(3,592)	43,241	43,241
2004	41	3.31	1.05179	56,316	2,862	(1,502)	(8,418)	(3,778)	45,481	45,481
2005	42	4.31	1.04979	59,120	3,005	(1,577)	(8,837)	(4,961)	46,751	46,751
2006	43	5.31	1.04779	61,945	3,148	(1,652)	(9,259)	(5,198)	48,985	48,985
2007	44	6.31	1.04579	64,782	3,292	(1,728)	(9,683)	(7,255)	49,409	49,409
2008	45	7.31	1.04380	67,620	3,437	(1,803)	(10,108)	(7,573)	51,573	51,573
2009	46	8.31	1.04182	70,448	3,580	(1,879)	(10,530)	(7,889)	53,730	53,730
2010	47	9.31	1.03984	73,254	3,723	(1,953)	(10,950)	(12,335)	51,739	51,739
2011	48	10.31	1.03786	76,027	3,864	(2,027)	(11,364)	(12,802)	53,698	53,698
2012	49	11.31	1.03588	78,755	4,003	(2,100)	(11,772)	(13,261)	55,624	55,624
2013	50	12.31	1.03391	81,426	4,138	(2,171)	(12,171)	(13,711)	57,511	57,511
2014	51	13.31	1.03194	84,026	4,271	(2,241)	(12,560)	(14,149)	59,348	59,348
2015	52	14.31	1.03000	86,547	4,399	(2,308)	(12,937)	(14,573)	61,128	61,128
2016	53	15.31	1.03000	89,144	4,531	(2,377)	(13,325)	(15,010)	62,962	62,962
2017	54	16.31	1.03000	91,818	4,666	(2,448)	(13,725)	(15,461)	64,851	64,851
2018	55	17.31	1.03000	94,573	4,806	(2,522)	(14,136)	(15,924)	66,796	66,796
2019	56	18.31	1.03000	97,410	4,951	(2,598)	(14,561)	(16,402)	68,800	68,800
2020	57	19.31	1.03000	100,332	5,099	(2,676)	(14,997)	(16,894)	70,864	69,415
2021	58	20.31	1.03000	103,342	5,252	(2,756)	(15,447)	(17,401)	72,990	68,814
2022	59	21.31	1.03000	106,442	5,410	(2,838)	(15,911)	(17,923)	75,180	68,218
2023	60	22.31	1.03000	109,635	5,572	(2,924)	(16,388)	(18,461)	77,435	67,627
2024	61	22.72	1.03000	47,054	2,391	(1,255)	(7,033)	(7,923)	33,234	28,247
<b>Total</b>				<b>\$1,819,126</b>	<b>\$92,454</b>	<b>(\$48,117)</b>	<b>(\$271,986)</b>	<b>(\$266,904)</b>	<b>\$1,324,574</b>	<b>\$1,297,191</b>

Unempl.	Tax Rate	Pers. Cons.	Pension Contrib. Rate	401(k) Contrib. Rate
3.0%	15.410%	8.18-20.52%	0.000%	2.538%

**EXHIBIT 3A. PRESENT VALUE OF LOST PENSION BENEFITS**  
**MRS. CAROL M. RABALAIS**  
SPECIAL MASTER WORKLIFE

YEAR	AGE	TIME FRAME	PENSION CONTRIB.	401 (K)	TAXES	CONSUMPTION	NET LOSS	PV OF NET LOSS
2001	38	0.31	\$0	\$374	(\$58)	(\$26)	\$291	\$291
2002	39	1.31	0	1,251	(193)	(87)	971	971
2003	40	2.31	0	1,318	(203)	(91)	1,024	1,024
2004	41	3.31	0	1,386	(214)	(96)	1,077	1,077
2005	42	4.31	0	1,455	(224)	(126)	1,105	1,105
2006	43	5.31	0	1,525	(235)	(132)	1,158	1,158
2007	44	6.31	0	1,595	(246)	(184)	1,165	1,165
2008	45	7.31	0	1,665	(257)	(192)	1,216	1,216
2009	46	8.31	0	1,734	(267)	(200)	1,267	1,267
2010	47	9.31	0	1,803	(278)	(313)	1,212	1,212
2011	48	10.31	0	1,871	(288)	(325)	1,258	1,258
2012	49	11.31	0	1,939	(299)	(337)	1,303	1,303
2013	50	12.31	0	2,004	(309)	(348)	1,348	1,348
2014	51	13.31	0	2,068	(319)	(359)	1,391	1,391
2015	52	14.31	0	2,130	(328)	(370)	1,432	1,432
2016	53	15.31	0	2,194	(338)	(381)	1,475	1,475
2017	54	16.31	0	2,260	(348)	(392)	1,520	1,520
2018	55	17.31	0	2,328	(359)	(404)	1,565	1,565
2019	56	18.31	0	2,398	(370)	(416)	1,612	1,612
2020	57	19.31	0	2,470	(381)	(429)	1,660	1,626
2021	58	20.31	0	1,158	(178)	(201)	779	734
2022	59	21.31	0	0	0	0	0	0
2023	60	22.31	0	0	0	0	0	0
2024	61	23.31	0	0	0	0	0	0
2025	62	24.31	0	0	0	0	0	0
2026	63	25.31	0	0	0	0	0	0
2027	64	26.31	0	0	0	0	0	0
2028	65	27.31	17,704	0	0	(3,633)	14,071	10,149
2029	66	28.31	30,349	0	0	(6,228)	24,121	16,745
2030	67	29.31	30,349	0	0	(6,228)	24,121	16,116
2031	68	30.31	30,349	0	0	(6,228)	24,121	15,511
2032	69	31.31	30,349	0	0	(6,228)	24,121	14,929
2033	70	32.31	30,349	0	0	(6,228)	24,121	14,369
2034	71	33.31	30,349	0	0	(6,228)	24,121	13,829
2035	72	34.31	30,349	0	0	(6,228)	24,121	13,310
2036	73	35.31	30,349	0	0	(6,228)	24,121	12,811
2037	74	36.31	30,349	0	0	(6,228)	24,121	12,330
2038	75	37.31	30,349	0	0	(6,228)	24,121	11,867
2039	76	38.31	30,349	0	0	(6,228)	24,121	11,422
2040	77	39.31	30,349	0	0	(6,228)	24,121	10,993
2041	78	40.31	30,349	0	0	(6,228)	24,121	10,580
2042	79	40.47	5,058	0	0	(1,038)	4,020	1,724
<b>Total</b>			<b>\$417,299</b>	<b>\$36,928</b>	<b>(\$5,691)</b>	<b>(\$91,044)</b>	<b>\$357,492</b>	<b>\$212,435</b>

**EXHIBIT 4A. LOSS ESTIMATED VALUE OF REPLACEMENT SERVICES**  
**MRS. CAROL M. RABALAIS**

YEAR	AGE	TIME FRAME	HOUSEHOLD SERVICES	CARE SERVICES	TOTAL SERVICES	PRESENT VALUE
2001	38	0.31			\$0	\$0
2002	39	1.31			0	0
2003	40	2.31			0	0
2004	41	3.31			0	0
2005	42	4.31			0	0
2006	43	5.31			0	0
2007	44	6.31			0	0
2008	45	7.31			0	0
2009	46	8.31			0	0
2010	47	9.31			0	0
2011	48	10.31			0	0
2012	49	11.31			0	0
2013	50	12.31			0	0
2014	51	13.31			0	0
2015	52	14.31			0	0
2016	53	15.31			0	0
2017	54	16.31			0	0
2018	55	17.31			0	0
2019	56	18.31			0	0
2020	57	19.31			0	0
2021	58	20.31			0	0
2022	59	21.31			0	0
2023	60	22.31			0	0
2024	61	23.31			0	0
2025	62	24.31			0	0
2026	63	25.31			0	0
2027	64	26.31			0	0
2028	65	27.31			0	0
2029	66	28.31			0	0
2030	67	29.31			0	0
2031	68	30.31			0	0
2032	69	31.31			0	0
2033	70	32.31			0	0
2034	71	33.31			0	0
2035	72	34.31			0	0
2036	73	35.06			0	0
<b>Total</b>			<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>

# **Exhibit B-2**

**John E. Beauzile**

28 Penny Lane

Binghamton, NY 13905

Email: [jeb2235@columbia.edu](mailto:jeb2235@columbia.edu)

**Jerry S. Goldman**

Anderson Kill

1760 Market Street, Suite 600

Philadelphia, PA 19103

Re: Update of Analysis of Economic Loss in the Matter of  
The Estate of **Mr. Francisco M. Mancini**

January 4, 2020

Dear Mr. Goldman,

You have asked me to update the present value numbers in the analysis of the likely economic loss award from the September 11<sup>th</sup> Victim Compensation Fund prepared by **The Fund** dated **June 2, 2004**. I have used their assumptions for wages, benefits, taxes, personal consumption, replacement services, and discount rate to estimate those values and bring them to the present. The valuation date chosen is **January 1, 2020**.

In preparing this update, the only document reviewed is **The Fund's** report. This update assumes the reader is familiar with the methodology used and assumptions made by **The Fund** and, therefore, they will not be restated here.

The update of **The Fund's** analysis is summarized in four (4) sets of Exhibits.

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I believe that I have already provided you with a copy of my curriculum vitae. If you need a copy, please let me know.

Sincerely,

John E. Beauzile



<b>Valuation Date</b>	01-Jan-20
<b>Discount Rate</b>	4.2%

**Exhibit 1. Summary of Economic Damages**  
**Mr. Francisco M. Mancini**

	<b><u>Present Value</u></b>
Present Value of Lost Earnings	\$4,932,922
Present Value of Retirement Benefits	1,318,592
Present Value of Lost Replacement Services	<u>0</u>
<b>Total</b>	<b><u><u>\$6,251,514</u></u></b>

Base Salary	Unempl.	Tax Rate	Benefits	Pers. Consump.
84,735	3.0%	19.500%	9,281	9.93-14.47%

**Exhibit 2a. Present Value of Lost Earnings**  
**Mr. Francisco M. Mancini**  
Special Master Worklife

Year	Age	Time Frame	Age-Specific Growth Factor	Earnings	Benefits	Unempl. Adj.	Taxes	Consumption	Net Earnings	PV of Net Earnings
2001	27	0.31	1.00000	\$25,983	\$2,846	\$0	(\$5,067)	(\$2,076)	\$21,686	\$21,686
2002	28	1.31	1.07816	91,357	9,869	(2,445)	(17,280)	(7,081)	74,421	74,421
2003	29	2.31	1.07611	98,310	10,923	(2,638)	(18,595)	(7,619)	80,380	80,380
2004	30	3.31	1.07406	105,590	11,593	(2,830)	(19,972)	(8,184)	86,197	86,197
2005	31	4.31	1.07201	113,194	12,289	(3,030)	(21,411)	(8,773)	92,269	92,269
2006	32	5.31	1.06997	121,115	13,015	(3,239)	(22,909)	(9,387)	98,595	98,595
2007	33	6.31	1.06794	129,343	13,767	(3,456)	(24,465)	(10,025)	105,164	105,164
2008	34	7.31	1.06591	137,868	14,545	(3,681)	(26,078)	(10,685)	111,968	111,968
2009	35	8.31	1.06388	146,674	15,349	(3,913)	(27,743)	(11,368)	118,999	118,999
2010	36	9.31	1.06185	155,746	16,177	(4,152)	(29,459)	(12,071)	126,241	126,241
2011	37	10.31	1.05983	165,065	17,029	(4,398)	(31,222)	(12,793)	133,681	133,681
2012	38	11.31	1.05781	174,608	17,902	(4,649)	(33,027)	(13,533)	141,301	141,301
2013	39	12.31	1.05580	184,351	18,793	(4,906)	(34,870)	(14,288)	149,080	149,080
2014	40	13.31	1.05379	194,268	19,703	(5,167)	(36,746)	(15,057)	157,001	157,001
2015	41	14.31	1.05179	204,329	20,626	(5,433)	(38,649)	(15,836)	165,037	165,037
2016	42	15.31	1.04979	214,501	21,564	(5,701)	(40,573)	(16,625)	173,166	173,166
2017	43	16.31	1.04779	224,752	22,512	(5,971)	(42,512)	(17,419)	181,361	181,361
2018	44	17.31	1.04579	235,044	23,465	(6,243)	(44,459)	(18,217)	189,591	189,591
2019	45	18.31	1.04380	245,340	24,425	(6,515)	(46,406)	(19,015)	197,829	197,829
2020	46	19.31	1.04182	255,600	25,385	(6,786)	(48,347)	(19,810)	206,043	201,516
2021	47	20.31	1.03984	265,782	26,344	(7,055)	(50,273)	(30,034)	204,764	192,194
2022	48	21.31	1.03786	275,843	27,301	(7,321)	(52,176)	(31,171)	212,476	191,393
2023	49	22.31	1.03588	285,741	28,248	(7,583)	(54,048)	(32,290)	220,068	190,242
2024	50	23.31	1.03391	295,430	29,185	(7,839)	(55,881)	(33,385)	227,510	188,748
2025	51	24.31	1.03194	304,867	30,104	(8,090)	(57,666)	(34,451)	234,765	186,916
2026	52	25.31	1.03000	314,013	31,009	(8,332)	(59,396)	(35,485)	241,809	184,765
2027	53	26.31	1.03000	323,434	31,936	(8,582)	(61,177)	(36,549)	249,061	182,635
2028	54	27.31	1.03000	333,137	32,896	(8,840)	(63,013)	(37,646)	256,534	180,533
2029	55	28.31	1.03000	343,131	33,883	(9,105)	(64,903)	(38,775)	264,230	178,453
2030	56	29.31	1.03000	353,425	34,901	(9,378)	(66,850)	(39,938)	272,159	176,399
2031	57	30.31	1.03000	364,028	35,944	(9,659)	(68,856)	(41,137)	280,320	174,366
2032	58	31.31	1.03000	374,948	37,024	(9,949)	(70,921)	(42,371)	288,732	172,359
2033	59	32.06	1.03000	289,648	28,602	(7,686)	(54,787)	(32,731)	223,046	128,436
<b>Total</b>				<b>\$7,346,467</b>	<b>\$739,151</b>	<b>(\$194,571)</b>	<b>(\$1,389,736)</b>	<b>(\$715,825)</b>	<b>\$5,785,486</b>	<b>\$4,932,922</b>

Unempl.	Tax Rate	Pers. Cons.	Pension Contrib. Rate	401(k) Contrib. Rate
3.0%	19.500%	9.93-14.47%	19.569%	0.000%

**Exhibit 3a. Present Value of Lost Pension Benefits**  
**Mr. Francisco M. Mancini**  
Special Master Worklife

Year	Age	Time Frame	Pension Contrib.	Projected Pension	Taxes	Consumption	Net Loss	PV of Net Loss
2001	27	0.31	\$5,085	\$0	\$0	(\$505)	\$4,580	\$4,580
2002	28	1.31	17,342	0	0	(1,721)	15,620	15,620
2003	29	2.31	18,662	0	0	(1,852)	16,809	16,809
2004	30	3.31	20,044	0	0	(1,989)	18,054	18,054
2005	31	4.31	21,487	0	0	(2,133)	19,354	19,354
2006	32	5.31	22,991	0	0	(2,282)	20,709	20,709
2007	33	6.31	24,552	0	0	(2,437)	22,115	22,115
2008	34	7.31	26,171	0	0	(2,598)	23,573	23,573
2009	35	8.31	27,842	0	0	(2,764)	25,079	25,079
2010	36	9.31	29,564	0	0	(2,934)	26,630	26,630
2011	37	10.31	31,333	0	0	(3,110)	28,223	28,223
2012	38	11.31	33,145	0	0	(3,290)	29,855	29,855
2013	39	12.31	34,994	0	0	(3,473)	31,521	31,521
2014	40	13.31	36,877	0	0	(3,660)	33,216	33,216
2015	41	14.31	38,786	0	0	(3,850)	34,937	34,937
2016	42	15.31	40,717	0	0	(4,041)	36,676	36,676
2017	43	16.31	42,663	0	0	(4,235)	38,429	38,429
2018	44	17.31	44,617	0	0	(4,429)	40,189	40,189
2019	45	18.31	46,571	0	0	(4,622)	41,949	41,949
2020	46	19.31	48,519	0	0	(4,816)	43,703	42,743
2021	47	20.31	50,452	0	0	(7,301)	43,150	40,501
2022	48	21.31	52,362	0	0	(7,578)	44,784	40,340
2023	49	22.31	54,240	0	0	(7,850)	46,391	40,103
2024	50	23.31	56,080	0	0	(8,116)	47,964	39,792
2025	51	24.31	57,871	0	0	(8,375)	49,496	39,408
2026	52	25.31	59,607	0	0	(8,626)	50,981	38,954
2027	53	26.31	61,395	0	0	(8,885)	52,510	38,506
2028	54	27.31	63,237	0	0	(9,152)	54,086	38,062
2029	55	28.31	65,134	0	0	(9,426)	55,708	37,624
2030	56	29.31	67,088	0	0	(9,709)	57,379	37,190
2031	57	30.31	69,101	0	0	(10,000)	59,101	36,762
2032	58	31.31	71,174	0	0	(10,300)	60,874	36,339
2033	59	32.31	54,982	0	0	(7,957)	47,025	26,940
2034	60	33.31	0	0	0	0	0	0
2035	61	34.31	0	0	0	0	0	0
2036	62	35.31	0	0	0	0	0	0
2037	63	36.31	0	0	0	0	0	0
2038	64	37.31	0	0	0	0	0	0
2039	65	38.31	0	22,500	(4,388)	(2,621)	15,491	6,934
2040	66	39.31	0	90,000	(17,550)	(10,485)	61,965	26,616
2041	67	40.31	0	90,000	(17,550)	(10,485)	61,965	25,543
2042	68	41.31	0	90,000	(17,550)	(10,485)	61,965	24,514
2043	69	42.31	0	90,000	(17,550)	(10,485)	61,965	23,526
2044	70	43.31	0	90,000	(17,550)	(10,485)	61,965	22,577
2045	71	44.31	0	90,000	(17,550)	(10,485)	61,965	21,667
2046	72	45.31	0	90,000	(17,550)	(10,485)	61,965	20,794
2047	73	46.31	0	90,000	(17,550)	(10,485)	61,965	19,956
2048	74	47.31	0	90,000	(17,550)	(10,485)	61,965	19,152
2049	75	48.31	0	90,000	(17,550)	(10,485)	61,965	18,380
2050	76	49.31	0	90,000	(17,550)	(10,485)	61,965	17,639
2051	77	50.31	0	90,000	(17,550)	(10,485)	61,965	16,928
2052	78	51.14	0	75,000	(14,625)	(8,737)	51,638	13,584
<b>Total</b>			<b>\$1,394,687</b>	<b>\$1,177,500</b>	<b>(\$229,613)</b>	<b>(\$311,194)</b>	<b>\$2,031,381</b>	<b>\$1,318,592</b>

**Exhibit 4a. Loss Estimated Value of Replacement Services**  
**Mr. Francisco M. Mancini**

<b>Year</b>	<b>Age</b>	<b>Time Frame</b>	<b>Household Services</b>	<b>Care Services</b>	<b>Total Services</b>	<b>Present Value</b>
2001	27	0.31			\$0	\$0
2002	28	1.31			0	0
2003	29	2.31			0	0
2004	30	3.31			0	0
2005	31	4.31			0	0
2006	32	5.31			0	0
2007	33	6.31			0	0
2008	34	7.31			0	0
2009	35	8.31			0	0
2010	36	9.31			0	0
2011	37	10.31			0	0
2012	38	11.31			0	0
2013	39	12.31			0	0
2014	40	13.31			0	0
2015	41	14.31			0	0
2016	42	15.31			0	0
2017	43	16.31			0	0
2018	44	17.31			0	0
2019	45	18.31			0	0
2020	46	19.31			0	0
2021	47	20.31			0	0
2022	48	21.31			0	0
2023	49	22.31			0	0
2024	50	23.31			0	0
2025	51	24.31			0	0
2026	52	25.31			0	0
2027	53	26.31			0	0
2028	54	27.31			0	0
2029	55	28.31			0	0
2030	56	29.31			0	0
2031	57	30.31			0	0
2032	58	31.31			0	0
2033	59	32.31			0	0
2034	60	33.31			0	0
2035	61	34.31			0	0
2036	62	35.06			0	0
<b>Total</b>			<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>

# **Exhibit B-3**

**John E. Beauzile**

28 Penny Lane  
Binghamton, NY 13905  
Email: [jeb2235@columbia.edu](mailto:jeb2235@columbia.edu)

**Jerry S. Goldman**

Anderson Kill  
1760 Market Street, Suite 600  
Philadelphia, PA 19103

Re: Update of Analysis of Economic Loss in the Matter of  
The Estate of **Mr. James Matthew Patrick**

January 4, 2020

Dear Mr. Goldman,

You have asked me to update the present value numbers in the analysis of the likely economic loss award from the September 11<sup>th</sup> Victim Compensation Fund prepared by **Maher, Crakes and Associates (MCA)** dated **September 29, 2003**. I have used their assumptions for wages, benefits, taxes, personal consumption, replacement services, and discount rate to estimate those values and bring them to the present. The valuation date chosen is **January 1, 2020**.

In preparing this update, the only document reviewed is **MCA's** report. This update assumes the reader is familiar with the methodology used and assumptions made by **MCA** and, therefore, they will not be restated here.

The update of **MCA's** analysis is summarized in four (4) sets of Exhibits.

- *Exhibit 1* provides the summary of Lost Earnings, Retirement Benefits, and Lost of Replacement Services;
- The set of *Exhibits 2s* shows the details behind the loss of earnings numbers;
- The *Exhibit 3* set provides supporting documentation for Retirement Benefits;
- The loss of Replacement Services amounts are in *Exhibits 4s*.

I believe that I have already provided you with a copy of my curriculum vitae. If you need a copy, please let me know.

Sincerely,

John E. Beauzile



<b>Valuation Date</b>	01-Jan-20
<b>Discount Rate</b>	4.2%

**Exhibit 1. Summary of Economic Damages**  
**Mr. James Matthew Patrick**

	<b><u>Present Value</u></b>
Present Value of Lost Earnings	\$5,155,174
Present Value of Retirement Benefits	254,797
Present Value of Lost Replacement Services	251,508
<b>Total</b>	<b><u><u>\$5,661,480</u></u></b>

Base Salary	Unempl.	Tax Rate	Benefits	Pers. Consump.
105,799	3.0%	23.930%	3,795	10.490%

**Exhibit 2a. Present Value of Lost Earnings**  
**Mr. James Matthew Patrick**  
Special Master Worklife

Year	Age	Time Frame	Age-Specific Growth Factor	Earnings	Benefits	Unempl. Adj.	Taxes	Consumption	Net Earnings	PV of Net Earnings
2001	31	0.31	1.00000	\$32,442	\$1,164	\$0	(\$7,763)	(\$2,589)	\$23,254	\$23,254
2002	32	1.31	1.06997	113,202	4,061	(2,676)	(26,277)	(8,762)	79,548	79,548
2003	33	2.31	1.06794	120,893	4,336	(2,858)	(28,062)	(9,358)	84,952	84,952
2004	34	3.31	1.06591	128,860	4,622	(3,046)	(29,911)	(9,974)	90,551	90,551
2005	35	4.31	1.06388	137,091	4,917	(3,241)	(31,822)	(10,611)	96,335	96,335
2006	36	5.31	1.06185	145,571	5,222	(3,441)	(33,790)	(11,268)	102,293	102,293
2007	37	6.31	1.05983	154,281	5,534	(3,647)	(35,812)	(11,942)	108,414	108,414
2008	38	7.31	1.05781	163,200	5,854	(3,858)	(37,882)	(12,632)	114,682	114,682
2009	39	8.31	1.05580	172,307	6,181	(4,073)	(39,996)	(13,337)	121,081	121,081
2010	40	9.31	1.05379	181,576	6,513	(4,292)	(42,148)	(14,055)	127,594	127,594
2011	41	10.31	1.05179	190,979	6,850	(4,515)	(44,330)	(14,782)	134,202	134,202
2012	42	11.31	1.04979	200,487	7,191	(4,739)	(46,537)	(15,518)	140,884	140,884
2013	43	12.31	1.04779	210,068	7,535	(4,966)	(48,761)	(16,260)	147,616	147,616
2014	44	13.31	1.04579	219,688	7,880	(5,193)	(50,994)	(17,005)	154,376	154,376
2015	45	14.31	1.04380	229,311	8,225	(5,421)	(53,228)	(17,750)	161,138	161,138
2016	46	15.31	1.04182	238,901	8,569	(5,648)	(55,454)	(18,492)	167,877	167,877
2017	47	16.31	1.03984	248,417	8,911	(5,872)	(57,663)	(19,228)	174,564	174,564
2018	48	17.31	1.03786	257,821	9,248	(6,095)	(59,846)	(19,956)	181,173	181,173
2019	49	18.31	1.03588	267,073	9,580	(6,313)	(61,993)	(20,672)	187,673	187,673
2020	50	19.31	1.03391	276,129	9,905	(6,528)	(64,095)	(21,373)	194,037	189,774
2021	51	20.31	1.03194	284,949	10,221	(6,736)	(66,143)	(22,056)	200,236	187,943
2022	52	21.31	1.03000	293,498	10,528	(6,938)	(68,127)	(22,718)	206,243	185,778
2023	53	22.31	1.03000	302,303	10,844	(7,146)	(70,171)	(23,399)	212,430	183,639
2024	54	23.31	1.03000	311,372	11,169	(7,361)	(72,276)	(24,101)	218,803	181,524
2025	55	24.31	1.03000	320,713	11,504	(7,582)	(74,444)	(24,824)	225,367	179,434
2026	56	25.31	1.03000	330,334	11,849	(7,809)	(76,678)	(25,569)	232,128	177,367
2027	57	26.31	1.03000	340,244	12,205	(8,043)	(78,978)	(26,336)	239,092	175,324
2028	58	27.31	1.03000	350,452	12,571	(8,285)	(81,347)	(27,126)	246,264	173,305
2029	59	28.31	1.03000	360,965	12,948	(8,533)	(83,788)	(27,940)	253,652	171,310
2030	60	29.31	1.03000	371,794	13,336	(8,789)	(86,301)	(28,778)	261,262	169,337
2031	61	30.31	1.03000	382,948	13,736	(9,053)	(88,890)	(29,642)	269,100	167,387
2032	62	31.31	1.03000	394,436	14,148	(9,324)	(91,557)	(30,531)	277,173	165,459
2033	63	32.31	1.03000	406,270	14,573	(9,604)	(94,304)	(31,447)	285,488	163,553
2034	64	33.31	1.03000	418,458	15,010	(9,892)	(97,133)	(32,390)	294,053	161,670
2035	65	34.08	1.03000	333,327	11,956	(7,880)	(77,372)	(25,801)	234,231	124,163
<b>Total</b>				<b>\$8,890,362</b>	<b>\$318,896</b>	<b>(\$209,398)</b>	<b>(\$2,063,873)</b>	<b>(\$688,223)</b>	<b>\$6,247,765</b>	<b>\$5,155,174</b>

Unempl.	Tax Rate	Pers. Cons.	Pension Contrib. Rate	401(k) Contrib. Rate
3.0%	23.930%	10.490%	4.000%	0.000%

**Exhibit 3a. Present Value of Lost Pension Benefits**  
**Mr. James Matthew Patrick**  
Special Master Worklife

Year	Age	Time Frame	Pension Contrib.	Net Pension (Projected-Vested)	Taxes	Consumption	Net Loss	PV of Net Loss
2001	31	0.31	\$1,298	\$0	\$0	(\$136)	\$1,162	\$1,162
2002	32	1.31	4,392	0	0	(461)	3,931	3,931
2003	33	2.31	4,691	0	0	(492)	4,199	4,199
2004	34	3.31	5,000	0	0	(524)	4,475	4,475
2005	35	4.31	5,319	0	0	(558)	4,761	4,761
2006	36	5.31	5,648	0	0	(592)	5,056	5,056
2007	37	6.31	5,986	0	0	(628)	5,358	5,358
2008	38	7.31	6,332	0	0	(664)	5,668	5,668
2009	39	8.31	6,686	0	0	(701)	5,984	5,984
2010	40	9.31	7,045	0	0	(739)	6,306	6,306
2011	41	10.31	7,410	0	0	(777)	6,633	6,633
2012	42	11.31	7,779	0	0	(816)	6,963	6,963
2013	43	12.31	8,151	0	0	(855)	7,296	7,296
2014	44	13.31	8,524	0	0	(894)	7,630	7,630
2015	45	14.31	8,897	0	0	(933)	7,964	7,964
2016	46	15.31	9,269	0	0	(972)	8,297	8,297
2017	47	16.31	9,639	0	0	(1,011)	8,628	8,628
2018	48	17.31	10,003	0	0	(1,049)	8,954	8,954
2019	49	18.31	10,362	0	0	(1,087)	9,275	9,275
2020	50	19.31	10,714	0	0	(1,124)	9,590	9,379
2021	51	20.31	11,056	0	0	(1,160)	9,896	9,289
2022	52	21.31	11,388	0	0	(1,195)	10,193	9,182
2023	53	22.31	11,729	0	0	(1,230)	10,499	9,076
2024	54	23.31	12,081	0	0	(1,267)	10,814	8,971
2025	55	24.31	12,444	0	0	(1,305)	11,138	8,868
2026	56	25.31	12,817	0	0	(1,345)	11,472	8,766
2027	57	26.31	13,201	0	0	(1,385)	11,817	8,665
2028	58	27.31	13,598	0	0	(1,426)	12,171	8,565
2029	59	28.31	14,005	0	0	(1,469)	12,536	8,467
2030	60	29.31	14,426	0	0	(1,513)	12,912	8,369
2031	61	30.31	14,858	0	0	(1,559)	13,300	8,273
2032	62	31.31	15,304	0	0	(1,605)	13,699	8,177
2033	63	32.31	15,763	0	0	(1,654)	14,110	8,083
2034	64	33.31	16,236	0	0	(1,703)	14,533	7,990
2035	65	34.08	12,933	0	0	(1,357)	11,576	6,137
<b>Total</b>			<b>\$344,985</b>	<b>\$0</b>	<b>\$0</b>	<b>(\$36,189)</b>	<b>\$308,796</b>	<b>\$254,797</b>

**Exhibit 4a. Loss Estimated Value of Replacement Services****Mr. James Matthew Patrick**

<b>Year</b>	<b>Age</b>	<b>Time Frame</b>	<b>Household Services</b>	<b>Care Services</b>	<b>Total Services</b>	<b>Present Value</b>
2001	31	0.31	\$2,166		\$2,166	\$2,166
2002	32	1.31	8,720		8,720	8,720
2003	33	2.31	8,698		8,698	8,698
2004	34	3.31	8,591		8,591	8,591
2005	35	4.31	8,591		8,591	8,591
2006	36	5.31	8,591		8,591	8,591
2007	37	6.31	8,316		8,316	8,316
2008	38	7.31	8,260		8,260	8,260
2009	39	8.31	8,260		8,260	8,260
2010	40	9.31	8,260		8,260	8,260
2011	41	10.31	8,260		8,260	8,260
2012	42	11.31	8,260		8,260	8,260
2013	43	12.31	8,260		8,260	8,260
2014	44	13.31	8,260		8,260	8,260
2015	45	14.31	8,260		8,260	8,260
2016	46	15.31	7,835		7,835	7,835
2017	47	16.31	5,761		5,761	5,761
2018	48	17.31	5,761		5,761	5,761
2019	49	18.31	5,710		5,710	5,710
2020	50	19.31	5,463		5,463	5,343
2021	51	20.31	5,463		5,463	5,128
2022	52	21.31	5,463		5,463	4,921
2023	53	22.31	5,463		5,463	4,723
2024	54	23.31	5,463		5,463	4,532
2025	55	24.31	5,463		5,463	4,350
2026	56	25.31	5,463		5,463	4,174
2027	57	26.31	5,463		5,463	4,006
2028	58	27.31	5,463		5,463	3,845
2029	59	28.31	5,463		5,463	3,690
2030	60	29.31	5,463		5,463	3,541
2031	61	30.31	5,463		5,463	3,398
2032	62	31.31	5,463		5,463	3,261
2033	63	32.31	5,463		5,463	3,130
2034	64	33.31	5,463		5,463	3,004
2035	65	34.31	6,273		6,273	3,310
2036	66	35.31	9,144		9,144	4,630
2037	67	36.31	9,144		9,144	4,444
2038	68	37.31	9,144		9,144	4,265
2039	69	38.31	9,144		9,144	4,093
2040	70	39.31	9,144		9,144	3,928
2041	71	40.31	9,144		9,144	3,769
2042	72	41.31	9,144		9,144	3,617
2043	73	42.31	9,144		9,144	3,472
2044	74	43.31	9,144		9,144	3,332
2045	75	44.31	9,144		9,144	3,197
2046	76	45.31	9,144		9,144	3,069
2047	77	45.48	1,585		1,585	519
<b>Total</b>			<b>\$335,208</b>	<b>\$0</b>	<b>\$335,208</b>	<b>\$251,508</b>

# **Exhibit B-4**

**John E. Beuzile**

28 Penny Lane

Binghamton, NY 13905

Email: [jeb2235@columbia.edu](mailto:jeb2235@columbia.edu)

**Jerry S. Goldman**

Anderson Kill

1760 Market Street, Suite 600

Philadelphia, PA 19103

Re: Update of Analysis of Economic Loss in the Matter of  
The Estate of **Mrs. Lucille King**

January 9, 2020

Dear Mr. Goldman,

You have asked me to update the present value numbers in the analysis of the likely economic loss award from the September 11<sup>th</sup> Victim Compensation Fund prepared by **The Chalfin Group Inc. ("TCG")** dated **June 27, 2002**. I have used their assumptions for wages, benefits, taxes, personal consumption, replacement services, and discount rate to estimate those values and bring them to the present. The valuation date chosen is **January 1, 2020**.

In preparing this update, the only document reviewed is **TCG's** report. This update assumes the reader is familiar with the methodology used and assumptions made by **TCG** and, therefore, they will not be restated here.

The update of **TCG's** analysis is summarized in four (4) sets of Exhibits.

- *Exhibit 1* provides the summary of Lost Earnings, Retirement Benefits, and Lost of Replacement Services;
- The set of *Exhibits 2s* shows the details behind the loss of earnings numbers;
- The *Exhibit 3* set provides supporting documentation for Retirement Benefits;
- The loss of Replacement Services amounts are in *Exhibits 4s*.

I believe that I have already provided you with a copy of my curriculum vitae. If you need a copy, please let me know.

Sincerely,

John E. Beuzile



<b>Valuation Date</b>	01-Jan-20
<b>Discount Rate</b>	0.0%

**Exhibit 1. Summary of Economic Damages**  
**Mrs. Lucille King**

	<b><u>Present Value</u></b>
Present Value of Lost Earnings	\$132,995
Present Value of Retirement Benefits	13,610
Present Value of Lost Replacement Services	873,197
<b>Total</b>	<b><u><u>\$1,019,801</u></u></b>

Base Salary	Unempl.	Tax Rate	Benefits	Pers. Consump.
33,689	3.0%	10.000%	0	24.700%

**Exhibit 2a. Present Value of Lost Earnings**  
**Mrs. Lucille King**  
Special Master Worklife

Year	Age	Time Frame	Age-Specific Growth Factor	Earnings	Benefits	Unempl. Adj.	Taxes	Consumption	Net Earnings	PV of Net Earnings
2001	59	0.31	1.00000	\$10,330	\$0	\$0	(\$1,033)	(\$2,296)	\$7,001	\$7,001
2002	60	1.31	1.00000	33,689	0	(910)	(3,268)	(7,264)	22,247	22,247
2003	61	2.31	1.00000	33,689	0	(910)	(3,268)	(7,264)	22,247	22,247
2004	62	3.31	1.00000	33,689	0	(910)	(3,268)	(7,264)	22,247	22,247
2005	63	4.31	1.00000	33,689	0	(910)	(3,268)	(7,264)	22,247	22,247
2006	64	5.31	1.00000	33,689	0	(910)	(3,268)	(7,264)	22,247	22,247
2007	65	5.97	1.00000	22,348	0	(603)	(2,168)	(4,819)	14,758	14,758
<b>Total</b>				<b>\$201,123</b>	<b>\$0</b>	<b>(\$5,151)</b>	<b>(\$19,540)</b>	<b>(\$43,437)</b>	<b>\$132,995</b>	<b>\$132,995</b>

Unempl.	Tax Rate	Pers. Cons.	Pension Contrib. Rate	401(k) Contrib. Rate
3.0%	0.000%	24.700%	4.000%	5.250%

**Exhibit 3a. Present Value of Lost Pension Benefits**

**Mrs. Lucille King**  
Special Master Worklife

Year	Age	Time Frame	Pension Contrib.	401(k)	Taxes	Consumption	Net Loss	PV of Net Loss
2001	59	0.31	\$413	\$542	\$0	(\$236)	\$720	\$720
2002	60	1.31	1,307	1,716	0	(747)	2,276	2,276
2003	61	2.31	1,307	1,716	0	(747)	2,276	2,276
2004	62	3.31	1,307	1,716	0	(747)	2,276	2,276
2005	63	4.31	1,307	1,716	0	(747)	2,276	2,276
2006	64	5.31	1,307	1,716	0	(747)	2,276	2,276
2007	65	5.97	867	1,138	0	(495)	1,510	1,510
<b>Total</b>			<b>\$7,816</b>	<b>\$10,258</b>	<b>\$0</b>	<b>(\$4,464)</b>	<b>\$13,610</b>	<b>\$13,610</b>

**Exhibit 4a. Loss Estimated Value of Replacement Services**  
**Mrs. Lucille King**

<b>Year</b>	<b>Age</b>	<b>Time Frame</b>	<b>Loss of Companionship</b>	<b>Guidance, Advice and Counsel</b>	<b>Household Services</b>	<b>Rent Expense</b>	<b>Total Services</b>	<b>Present Value</b>
2001	59	0.31	\$3,588	\$797	\$4,784	\$0	\$9,169	\$9,169
2002	60	1.31	11,700	2,600	15,600	3,616	33,516	33,516
2003	61	2.31	11,700	2,600	15,600	3,945	33,845	33,845
2004	62	3.31	11,700	2,600	15,600	3,945	33,845	33,845
2005	63	4.31	11,700	2,600	15,600	3,945	33,845	33,845
2006	64	5.31	11,700	2,600	15,600	3,945	33,845	33,845
2007	65	6.31	18,264	2,600	15,600	3,945	40,409	40,409
2008	66	7.31	31,200	2,600	15,600	3,945	53,345	53,345
2009	67	8.31	31,200	2,600	15,600	3,945	53,345	53,345
2010	68	9.31	31,200	2,600	15,600	3,945	53,345	53,345
2011	69	10.31	31,200	2,600	15,600	3,945	53,345	53,345
2012	70	11.31	31,200	2,600	15,600	3,945	53,345	53,345
2013	71	12.31	31,200	2,600	15,600	3,945	53,345	53,345
2014	72	13.31	31,200	2,600	15,600	3,945	53,345	53,345
2015	73	14.31	31,200	2,600	15,600	3,945	53,345	53,345
2016	74	15.31	31,200	2,600	15,600	3,945	53,345	53,345
2017	75	16.31	31,200	2,600	15,600	3,945	53,345	53,345
2018	76	17.31	31,200	2,600	15,600	3,945	53,345	53,345
2019	77	18.31	31,200	2,600	15,600	3,945	53,345	53,345
2020	78	18.58	8,529	711	4,264	1,078	14,582	14,582
<b>Total</b>			<b>\$463,281</b>	<b>\$48,308</b>	<b>\$289,848</b>	<b>\$71,760</b>	<b>\$873,197</b>	<b>\$873,197</b>